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U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

DEPT. OF TRANSPORTATION
DOCTETS

02 JUL 26 PM 3:30

Memorandum

NHTSA-02-12065-2

Subject: ExParte Meeting with E-Z-ON Products, Inc., representatives

Date: JUN 19 2002

From: Tewabe Asebe
Safety Standards Engineer, Office of Crashworthiness Standards

Reply to
Attn. of:

To: NHTSA Docket: NHTSA-2002-12065

THRU: George E. Mouchahoir
Division Chief, Office of Crashworthiness Standards

Roger A. Saul
Director, Office of Crashworthiness Standards

Jacqueline Glassman
Chief Counsel

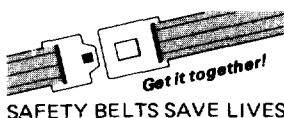
On June 13, 2002, representatives of E-Z-ON Products, Inc., met, at E-Z-ON's request, with NHTSA staff members at the NHTSA's Headquarters, in Washington, DC. The objective of the meeting was to discuss E-Z-ON's petition to amend Federal motor vehicle safety standard (FMVSS) No. 213 to allow the use of seat-mounted child restraint system (CRS) on standard school bus seats (copy of agenda attached).

At the meeting, Connie Murray, Owner/President, E-Z-ON Products, Inc., presented new E-Z-ON vest restraint configurations (Model # 203 Front Closure, and Model #225-SB Latch System). E-Z-ON provided product literature and previous correspondence with NHTSA pertaining their products.

Attendees were: Connie Murray, E-Z-ON, Robert Boehm, P.R./Adv. E-Z-ON, and Steve Clark, Attorney, E-Z-ON. Attendees from NHTSA were: George Mouchahoir, Michael Huntley, Charles Hott, Tewabe Asebe, Maria Vegega, Tom Hollowell, Linda McCray, Deirdre Fujita, Dorothy Nakama, Gaston Auguste, Zack Fraser, and Tony Lazzaro.

Please include this memorandum and the above attachment in DOT Docket, NHTSA-2002-12065.

Attachment
Meeting agenda





E-Z-ONTM PRODUCTS, INC. OF FLORIDA

TRANSPORTATION SAFETY EQUIPMENT FOR PEOPLE WITH SPECIAL NEEDS

Manufacturer of the E-Z-ONTM Vest

June 10, 2002

ATTN: Tewabe Asebe
Safety Performance Office
Fax: 202-493-2739

Dear Tewabe,

I am sorry to hear that our meeting is being shortened to 1.5 hours. However, we appreciate the opportunity to offer our insight with the intention of helping NHTSA develop guidelines for *Best Practices* for pupil transportation. The pupil transportation industry needs NHTSA to develop guidelines that empower pupil transporters to meet the everyday challenges of pupil transportation in the best way possible for each child.

Here is our suggested Agenda. Please let us know if you would like to add anything:

- I. PRESENTATION OF NEW E-Z-ON VEST RESTRAINT CONFIGURATIONS
 - A. Model #203 Front Closure
 - B. Model # 225-SB LATCH SYSTEM
- II. REQUESTS/RECOMMENDATIONS FOR UPDATING GUIDELINES
 - A. Request amending Section 5.3.1 guideline to allow seat-mounted restraints on school buses as long as certain precautions are followed. Suggestions include:
 - assigned seating positions;
 - passengers in the rearward seat must also be secured in a CRS/CSRS;
 - restrained students on one side of the bus, and unrestrained students on the other side;
 - Medically fragile students who require close monitoring should be allowed in front seats as long as other precautions are followed.
 - B. Request NHTSA consider writing a new Federal Motor Vehicle Safety Standard for CRS and CSRS used exclusively on school bus seats. A committee of "hands-on" individuals (drivers, monitors, OT, PT's), engineers, manufacturers, legal advisors could assist in the development of this standard.
 - C. Request developing guidelines for adding or allowing a top tether in LATCH systems for School Buses.
 - D. Recommend keeping 30-mph crash pulse criteria. Restraint manufacturers are already meeting that criteria.
 - E. E-Z-ON's position on lap/shoulder type belts on large school buses: they should become standard equipment. However, options for a top tether in combination with Lower Anchors and seat-mounted restraints should be made available to address the individual needs and challenges of certain passengers.

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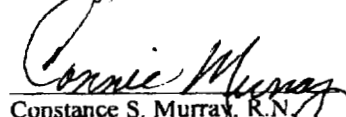
III. QUESTIONS:

- A. Special Needs, Head Start, and Pre-K restraint products must meet all aspects of FMVSS213, why are they tested on school bus seats and not on the required FMVSS213 bench seat? Why aren't Child Safety Seat manufacturers required to test products in all makes and models of family vehicles? The seat configuration in a sedan, mpv, suv, etc. are very different, yet to meet FMVSS213 these products are tested on one seat and installed in numerous types of vehicles.
- B. As noted in the 1997/1999 NHTSA test data, E-Z-ON's restraints were improperly installed and adjusted in all but one test. Is that standard procedure for all restraints? Is that going to be done again in the upcoming tests on the E-Z-ON Vest/seat-mount?
- C. The additional test showing the danger posed by unrestrained or lap-belted adult-sized passengers in the rearward seat was an important finding that led to safer use of restraints. Other research has shown that this danger applies to many kinds of restraint configurations besides vests/harnesses. Is NHTSA planning to raise industry awareness that this danger also applies to other restraint configurations?
- D. FMVSS225 LATCH SYSTEM: Some auto manufacturers have placed the top tether anchorages on the posterior side of seat backs. Isn't the loading on the seat back similar to a seat-mounted restraint on a school bus seat?

/ IV. PRESENT REFERENCE BINDER/GET NHTSA FEEDBACK ON COMMUNICATIONS

Thank you for your time, we look forward to seeing you at 9:00am on Thursday the 13th of June.

Sincerely,


Constance S. Murray, R.N.
Owner/President

Note: Larry W. Schneider, Ph.D will not be attending the meeting. The requested video equipment will not be needed.